

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

KATHLEEN WILER	Case No.
Plaintiff,	
v.	
KENT STATE UNIVERSITY,	
Defendant.	

**MOTION FOR LEAVE TO APPEAR PRO HAC VICE**

Pursuant to Local Rule 83.5(h), Karen Lefton, counsel for the Plaintiff, respectfully moves this Court to admit *pro hac vice* attorney Thomas Newkirk of the firm Newkirk Zwagerman, P.L.C, 521 E Locust, Suite 300, Des Moines, IA 50309, and to grant Mr. Newkirk leave to actively participate in all proceedings in connection with the above-captioned matter on behalf of the Plaintiff.

Thomas Newkirk, a lawyer who is not a member of the bar of this district, requests to appear in this case *pro hac vice* on behalf of the named Plaintiff. Mr. Newkirk states that he is a member in good standing of the bar of the Iowa Supreme Court and has been so since June 16, 1989. His state bar identification number is AT0005791. A certificate of good standing expired on March 2, 2019 is attached to this motion, but counsel will shortly provide an updated certificate. Mr. Newkirk is also admitted to practice in the Northern District of Iowa, the Southern District of Iowa, and the Eighth Circuit Court of Appeals. Mr. Newkirk has never been subject to any disciplinary actions of any kind by any court, state, territory, or District of Columbia. Mr. Newkirk agrees to submit to and comply with all provisions and requirement of the rules of conduct applicable to lawyers admitted to practice before the U.S. District Court for the Northern District of Ohio in

connection with his *pro hac vice* representation in the case. For these reasons, counsel for the Plaintiff respectfully requests that the Court grant this Motion.

Respectfully submitted,

/s/ Karen C. Lefton

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and

NEWKIRK ZWAGERMAN, P.L.C.



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